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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FINJAN, LLC, a Delaware Limited Liability
Company,

Plaintiff,

v.

SONICWALL INC., a Delaware Corporation,

Defendant.

Case No.: 5:17-cv-04467-BLF-VKD

**DEFENDANT SONICWALL INC.'S
IDENTIFICATION OF REMAINING
ISSUES IN ITS PENDING MOTION TO
STRIKE**

SonicWall hereby files this response to the Court's March 8, 2021 Order (ECF 386). SonicWall specifies the following two remaining issues in its Motion to Strike (ECF 300) that still require resolution:

1. Finjan's infringement contentions associated with the '408 Patent detailed in Section III.B. of the Motion to Strike. SonicWall agrees with the Court's review that these issues remain alive.

2. Finjan's infringement contentions associated with the '780 Patent detailed in Section III.C. of SonicWall's Motion to Strike. The Court's Order on SonicWall's Motion for Partial Summary Judgment (ECF 381) eliminated all of Finjan's infringement theories for the '780 Patent involving SonicWall's Gateways. However, Finjan's expert report also includes infringement allegations for the '780 Patent accusing (i) Capture ATP alone and (ii) Capture ATP in combination with SonicWall's Email Security ("ES") products. Both of these allegations are at issue in Section III.C of the Motion to Strike (concerning Capture ATP allegedly extracting files from compressed or archive files). SonicWall believes that the resolution of the issues identified in Section III.C of the Motion to Strike should lead to the elimination of all remaining infringement theories concerning the '780 Patent, but SonicWall would confer with Finjan on the status of the '780 Patent in the event the Court were to grant this portion of the Motion to Strike.

Dated: March 11, 2021

Respectfully Submitted,

/s/ Nicole E. Grigg

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